

To: Cool, Richard[Cool.Richard@epa.gov]
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From: Lana.Davis@shell.com
Sent: Wed 5/27/2015 12:10:00 AM
Subject: Discoverer LWIs

**Attachments Withheld Pending CBI
Determination**

[LWI Discoverer D011 Bilge Waste - 4-6-15.pdf](#)
[LWI Discoverer D013 Mud Cuttings Cement at Seafloor - 4-6-15.pdf](#)
[LWI Discoverer Transition from MARPOL to NPDES Regulations - 4-3-15.pdf](#)
[LWI Discoverer Zero Discharge Mud and Cuttings - 4-4-15.pdf](#)
[LWI Discoverer D001 Water Based Muds and Cuttings - 4-3-15.pdf](#)
[LWI Discoverer D002 Deck Drainage - 4-3-15.pdf](#)
[LWI Discoverer D003 Sanitary Waste - 4-3-15.pdf](#)
[LWI Discoverer D004 Domestic Waste - 4-3-15.pdf](#)
[LWI Discoverer D005 Desalinization Waste - 4-4-15.pdf](#)
[LWI Discoverer D006 BOP Fluid - 4-4-15.pdf](#)
[LWI Discoverer D007 Boiler Blowdown - 4-27-15.pdf](#)
[LWI Discoverer D008 Fire Control System Test Water - 4-27-15.pdf](#)
[LWI Discoverer D009 Air Compressor Cooler - 4-27-15.pdf](#)
[LWI Discoverer D009 Cement Unit - 4-27-15.pdf](#)
[LWI Discoverer D009 Generators - 4-4-15.pdf](#)
[LWI Discoverer D009 HVAC and Refrigerator Units - 4-27-15.pdf](#)
[LWI Discoverer D009 Main Engine - 4-28-15.pdf](#)
[LWI Discoverer D009 SCR AC Unit - 4-27-15.pdf](#)
[LWI Discoverer D010 Ballast Water - 4-6-15.pdf](#)
[LWI Discoverer D012 Excess Cement Slurry 4-26-15.docx](#)
[NPDES MasterSheet Disco 2015.xlsx](#)
[PCE Pacific - Field Report Nobel Discoverer 5-21-15.pdf](#)

Hi Rick,

Thanks for going over all your questions, misc items Friday with me. Per your request, attached are all the NPDES permit related LWIs for the Noble Discoverer. Due to the number and size of the documents I will be sending you the Transocean LWIs in a later e-mail. I believe most of your questions will be answered in the attached LWIs but if not, perhaps during our recon inspection you'll get more clarity on the whose and processes.

You'll also noticed I attached the M-I SWACO Master Spreadsheet so that you'll be able to see how they summarize their daily discharge information and submit to Shell Alaska Venture Environmental. The M-I Compliance Specialist take the sampling data from their field logs, as well as from various Nobles daily estimated discharges activity reports and they summarize the information and record it on the Master Spread sheet. Buddy and or Jeff could explain the process to you better than I but you did ask about seeing the Master Spreadsheet, so it has been included.

I did contact Noble about their SOPs and their operating, documentation procedures and their Environmental Compliance manual. Unfortunately, neither are ready for distribution as they are currently updating them to reflect the changes that have been done to the rig since 2012. I was assured they would be updated and for review prior to Discoverer getting into Dutch Harbor.

With respect to your deck drainage I talk with Buddy Brooks about your deck drainage / skimmer question see his response below:

The skimmer/surge tanks has 2 primary applications are listed below:

- The re-circ line from the OWS to skimmer tank allows us to run the OWS used to treat contaminated deck drainage without discharging until all tests and samples have been performed.
- Tank can also be used to store all fluid from the rig floor (instead of going to MPC). This would help if we we're processing fluid from the storage tanks and didn't want to exceed the MPC's flow rate, repairing the MPC, or a massive deluge and the MPC couldn't keep up.

Also, fluids spilled on decks that don't drain into P3 or S3 and need to be processed will be pumped into the skimmer tank. Hopefully we will never use the skimmer tank for this but it's a contingency plan in the unlikely event deck drainage can't drain to the P3 or S3. We can also send MPC reject water to the skimmer tank if we ever had too. Buddy couldn't think of a scenario where they would need to do this but again, it's an option/contingency plan.

I talked with the Rig Superintends (Noble and Transocean) about a date for our recon inspection. It could be as early as June 1st but I'm checking to see if June 8th and 9th would work as those dates would work better for me. I'll keep you posted on the dates.

Hope you were able to get out and enjoy some of the Memorial Day weekend. I did manage to take the weekend off.

Regards,

Lana Davis

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Thank you for this morning's discussion on these items. I appreciate your time and the additional clarifying information.

Per that discussion and as a follow-up, would you please forward copies of (1) all Local Work Instructions for the Discoverer and Polar Pioneer that are related, directly or indirectly, to the NPDES permit, including the Polar Pioneer's LWI for Zero Discharge of Muds/Cuttings and (2) the NPDES Master Spreadsheet template?

In addition and related to the Discoverer, items 3 and 5 below, would you also forward copies of any Noble Discoverer SOPs, manual excerpts or written waste stream management procedures regarding deck drainage (including from the rig floor) and contaminated ballast water that will be used by Shell/Noble during 2015 drill season operations.

In regard to deck drainage, this request includes any Noble equipment descriptions and related Noble operating and documentation procedures used to manage deck drainage identified in the Shell April 2015 Noble Discoverer BMP Plan. This request includes any equipment and system operating/record keeping procedures related to the BMP Plan Appendix A, schematic diagram for the deck drainage discharge and BMP Plan Sections 4.4.2 and 7.2 (e.g., holding tanks, multi-phase clarifier, skimmer/surge tank, overflow tank, oil water separator(s), oil content measuring devices [oil content meters, etc]).

If possible, I would appreciate receiving these documents in advance of the recon inspection so that I might have time to review the materials and be better prepared to discuss any follow-up questions during the inspection. In addition, if there is any time lapse in compiling the requested information, I would prefer that you send me what is available when it is available rather than delaying submission until all materials are compiled. I apologize if this preferred method creates more inconvenience but with the limited time before early June, I would appreciate getting materials as they become available in order to avoid getting jammed up just before the recon inspections.